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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his
capacity as Trustee of the Beverly E. Carlson and
Helen V. Carlson Joint Trust; LORESIA
VALLETTE, in her capacity as representative of
the Lawrence Quinlan Trust; MICHELE LYTLE,
in her capacity as Trustee of the Boris Family
Revocable Trust; RALPH SCHMIDT, by and
through his Guardian Ad Litem, HEATHER
FISHER; PATRICIA LINDSTROM, as successor-
in-interest to the Estate of ARTHUR
LINDSTROM; BERNIE JESTRABEK-HART;
and JEANETTE ALGARME; on their own
behalfs and on behalf of others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.;
BROOKDALE SENIOR LIVING
COMMUNITIES, INC.; and DOES 1 through 100,
Defendants.

Case No. 4:17-cv-03962-HSG

**STIPULATION AND ORDER RE:
SUBMISSION OF TRIAL TIME
ESTIMATE.**

Judge: Hon. Haywood S. Gilliam, Jr.

STIPULATION

WHEREAS, on August 1, 2024, following a case management conference of that date, the Court issued a minute order which required that the parties submit, among other things, an estimate for the number of hours required by each side to try the injunctive relief claims of the certified subclasses;

WHEREAS, the parties have met and conferred and have agreed, subject to this Court's approval, that additional time is needed to develop accurate trial time estimates in light of the fact that expert discovery is not yet completed and that the parties are in the midst of preparing for and taking expert depositions and are engaged in briefing Plaintiffs' Motion to Certify Order for Interlocutory Appeal and Defendants' Motion to Decertify the Rule 23(b)(2) Access Barrier Subclass.

NOW, THEREFORE, IT IS HEREBY STIPULATED, subject to this Court's approval, that the deadline for the parties to submit their estimate for the number of hours required by each side to try the injunctive relief claims of the certified subclasses be extended by 30 days, to October 3, 2024.

IT IS SO STIPULATED.

DATED: August 28, 2024

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

By: Guy B. Wallace
Guy B. Wallace

Attorneys for Plaintiffs and the Certified
Subclasses

1 DATED: August 28, 2024

MOORE & LEE, P.C.

2 By: Erica Rutner

3 Erica Rutner

4 Attorneys for Defendants

5
6 **ATTORNEY ATTESTATION**

7 Pursuant to Local Rule 5-1(i)(3), I attest that all other signatures listed, in whose behalf
8 this filing is submitted, concur in the filing's content and have authorized the filing.

9
10 DATED: August 28, 2024

SCHNEIDER WALLACE
COTTRELL KONECKY LLP

11
12 By: Guy B. Wallace

Guy B. Wallace

13 Attorneys for Plaintiffs and the Certified
14 Subclasses

15
16 **CERTIFICATE OF SERVICE**

17 I hereby certify that I electronically filed the foregoing document with the Clerk of the
18 Court for the United States District Court, Northern District of California, by using the Court's
19 CM/ECF system on August 28, 2024.

20 I certify that all participants in the case are registered CM/ECF users and that service will
21 be accomplished by the Court's CM/ECF system.

22 Dated: August 28, 2024

/s/ Guy B. Wallace


23 Guy B. Wallace

ORDER

The Court, having considered the above Stipulation of Plaintiffs and Defendants, and good cause appearing therefor, IT IS HEREBY ORDERED that the deadline for the parties to submit their estimate for the number of hours required by each side to try the injunctive relief claims of the certified subclasses is extended by 30 days to October 3, 2024.

Good cause appearing, IT IS SO ORDERED.

DATED: 8/29/2024


Hon. Haywood S. Gilliam, Jr.
United States District Judge